

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

TERESA ALTHOFF,)	
)	
Plaintiff,)	
)	
v.)	No. 3:14-CV-00131-MJR-PMF
)	
THE UNITED STATES OF AMERICA,)	JURY TRIAL DEMANDED
SCOTT BRANNAN, M.D.,)	
CAPE RADIOLOGY GROUP. P.C.,)	
and SOUTHERN ILLINOIS HOSPITAL)	
SERVICES, d/b/a MEMORIAL)	
HOSPITAL OF CARBDONALE,)	
a corporation,)	
)	
Defendants.)	

SEPARATE ANSWER AND AFFIRMATIVE DEFENSES OF
SCOTT BRANNAN, M.D.

COMES NOW Defendant Scott Brannan, M.D. ("Brannan") and for his Separate Answer and Affirmative Defenses in response to Plaintiff's Complaint states as follows:

ANSWER TO COUNT I
(United States of America)

Brannan makes no response to the allegations of Count I of Plaintiff's Complaint, as said count is not directed against him. To the extent any allegations of fact are intended to be directed against Brannan, those allegations are expressly denied.

ANSWER TO COUNT II
(Scott Brannan, M.D.)

1. Brannan is without sufficient information or belief to admit or deny the allegations of paragraph 1 of Count II of Plaintiff's Complaint and therefore denies the same.
2. Brannan admits that he was a medical doctor, that he was licensed to practice medicine in the State of Illinois, and was an employee of Cape Radiology, P.C. at the times

referenced in Plaintiff's Complaint. Brannan denies the remaining allegations of paragraph 2 of Count II of Plaintiff's Complaint.

3. Brannan admits that Southern Illinois Hospital Services, d/b/a Memorial Hospital of Carbondale, was doing business in Illinois at the times referenced in Plaintiff's Complaint. Brannan is without sufficient information or belief to admit or deny the remaining allegations of paragraph 3 of Count II of Plaintiff's Complaint and therefore denies the same.

4. Brannan is without sufficient information or belief to admit or deny the allegations of paragraph 4 of Count II of Plaintiff's Complaint and therefore denies the same.

5. Brannan is without sufficient information or belief to admit or deny the allegations of paragraph 5 of Count II of Plaintiff's Complaint and therefore denies the same.

6. Brannan admits that he treated Teresa Althoff at Carbondale Memorial Hospital. Brannan denies the remaining allegations of paragraph 6 of Count II of Plaintiff's Complaint.

7. Brannan denies the allegations of paragraph 7 of Count II of Plaintiff's Complaint, including the allegations of sub-paragraphs a), b) and c).

8. Brannan denies the allegations of paragraph 8 of Count II of Plaintiff's Complaint and therefore denies the same.

**ANSWER TO COUNT III
(Cape Radiology Group, P.C.)**

Brannan makes no response to the allegations of Count III of Plaintiff's Complaint, as said count is not directed against it. To the extent any allegations of fact are intended to be directed against Brannan, those allegations are expressly denied.

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the 10th day of March, 2014 the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system on the following: **Samantha Unsell**, Keefe & Keefe, P.C., Attorneys for Plaintiff, #6 Executive Woods Court, Belleville, IL 62226, Attorney for Plaintiff, and **John C. Ryan and Kara L. Jones**, Feirich, Mager, Green & Ryan, 2001 West Main, Suite 101, PO BOX 1570, Carbondale, IL 62903, Attorneys for Southern Illinois Hospital Services.

/s/ Ryan J. Gavin

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